

SIDLEY AUSTIN LLP
ONE SOUTH DEARBORN STREET
CHICAGO, IL 60603
+1 312 853 7000
+1 312 853 7036 FAX

AMERICA • ASIA PACIFIC • EUROPE

+1 312 853 7716 JHEYDE@SIDLEY.COM

December 28, 2020

By Electronic Submission to FOIAOnline.gov

National FOIA Office U.S. Environmental Protection Agency 1200 Pennsylvania Ave., N.W. (2310A) Washington, DC 20460

Re: Freedom of Information Act Request

Dear Madam or Sir:

Pursuant to the Freedom of Information Act, we request the following documents. The numbered requests below all relate to EPA's canister air sampling conducted from May 2018 to the present near the Sterigenics US, LLC facility located at 7775 South Quincy, Willowbrook, Illinois (the "Sampling Programs").

- 1. All documents (including field documentation or notes) and communications generated or collected in the course of the Sampling Programs, including but not limited to daily activity logs, sampling field forms, site observations, start and stop times of sampling, GPS coordinates, initial and final canister pressures, records and data files from the meteorological station established in conjunction with the Sampling Programs, photographs, video footage, and any other information captured in the field.
- 2. All chain of custody forms and documentation and related field sampling documentation generated in the course of the Sampling Programs.
- 3. All documents and communications relating to quality assurance and quality control of the test results generated by the Sampling Programs, including but not limited to notes prepared in the course of review by EPA personnel of data packages, requests for further information or re-evaluation, and documents and communications related to supplemental review of laboratory results.
- 4. All communications regarding the Sampling Programs between EPA and the laboratory or laboratories analyzing samples from the Sampling Programs.

SIDLEY

National FOIA Office December 28, 2020 Page 2

- 5. Laboratory sample receiving records, chromatograms, records relating to the cleaning and validation of canisters, pressure measurements, calculations, records of calibration of instruments, records of quality assurance and quality control of the test results.
- 6. Any data packages or electronic data deliverables ("EDDs") generated by the laboratory (ies) analyzing the samples.
- 7. Any documents describing the sources and certifications of the standards used by the laboratory(ies) used in analyzing all samples.
- 8. All laboratory standard operating procedures and other documents that provide a complete description of any laboratory method used to analyze the samples.
- 9. All method detection limit studies applicable to the laboratory's (or laboratories') analysis of the samples.
- 10. All documentation of revisions to sampling or analytical methods used in the Sampling Programs.
- 11. All documentation and communications related to verification testing or reviews of analytical methods, including documents and communications regarding potential interference or residual ethylene oxide present in canisters after analysis and cleaning.

We would prefer electronic copies of the requested records. In particular, we would prefer to receive the original file format(s) in which the records were created, rather than receiving pdf copies.

For EPA's reference in searching for responsive records, the Sampling Programs are described on EPA's website at https://www.epa.gov/il/sterigenics-willowbrook-facility-what-we-know, https://www.epa.gov/il/sterigenics-willowbrook-facility-agency-response, and https://www.epa.gov/il/sterigenics-willowbrook-facility-updates. According to the website, EPA conducted canister air sampling for three days in mid-May 2018 near the Sterigenics Willowbrook facility. EPA also conducted outdoor air quality monitoring from November 13, 2018 to March 31, 2019. These sampling efforts are part of our phrase "Sampling Programs." Based on these websites, EPA organizations that may have responsive records include: (1) the Air Quality Assessment Division within the Office of Air Quality Planning and Standards; and (2) Region 5.

We confirm in advance our willingness to pay all reasonable costs associated with search and duplication. However, should these costs exceed \$1,000, please contact us before proceeding.

SIDLEY

National FOIA Office December 28, 2020 Page 3

Sincerely,

/s/ John M. Heyde

John M. Heyde Counsel